

July 19, 2012

NOTICE OF EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

**Re: Lifeline Link Up Reform and Modernization - WC Docket No. 11-42
Federal-State Joint Board on Universal Service – CC Docket No. 96-45
Lifeline and Link Up – WC Docket No. 03-109
Advancing Broadband Literacy Through Digital Literacy Training - WC
Docket No. 12-23**

Dear Ms. Dortch:

On Thursday July 19, 2012 Amina Fazlullah and Sandy Tsai of the Benton Foundation¹ along with Sarah Morris and Lassana Magassa of the Open Technology Institute at New America Foundation (NAF), and Olivia Wein of the National Consumer Law Center (NCLC) met with Commissioner Pai's Wireline Advisor, Nick Degani, regarding the above caption Lifeline and Link Up proceedings.

The Benton Foundation (Benton) urged the Commission to focus closely on the needs of the Lifeline population while crafting a digital literacy program. Benton also strongly encouraged the Commission to direct digital literacy funds towards groups that are already successfully working on digital literacy issues. Benton expressed concern towards a potential digital literacy program that would direct money for digital literacy to Eligible Telecommunication Carriers (ETCs) or through ETCs. ETCs have no expertise in digital literacy

¹ www.benton.org, Benton Foundation public filings, including but not limited to these reply comments, represent the institutional view of the Foundation as opposed to the views of any individual officer or director.

training and Benton is concerned that a direction of digital literacy funds through ETCs would result in poor digital literacy outcomes. Benton urged the Commission to carefully craft a program that would ultimately support the good digital literacy programs spurred by NTIA efforts and to also consider programs run by schools, libraries and other community anchor institutions. Benton also encouraged the Commission to build a strong portfolio of Lifeline broadband pilots with the goal of gaining the strongest data possible. Benton is strongly committed to swift and proper transition of Lifeline to include a broadband component and believes that strong data from the pilot program will greatly aid in the transition of the program.

NAF similarly urged the Commission to structure the proposed digital literacy program in a way that does not direct support to ETCs. Instead, NAF noted that community organizations and facilities that already have community ties are the best entities to which to direct digital literacy support, as they are places that have already established trust within those communities, and they provide encouraging and accommodating venues for digital literacy training and other assistance. NAF also highlighted the need for the Commission's digital literacy program to support existing digital literacy training efforts, and it noted the harms that may result if those efforts are excluded. Many existing digital literacy training efforts could benefit from continued support, and excluding them would both create a new batch of time-limited digital literacy opportunities and would prevent existing programs from sharing their experiences and knowledge with others as the Commission's program is developed.

NCLC expressed a strong interest in a robust digital literacy program that would be available for the full array of Lifeline-eligible consumers and also voiced support for designing a digital literacy program that allows community anchor institutions to have a key role in providing the trainings. NCLC noted its recent joint consumer filings regarding the structure of a

digital literacy program also expressed concern over reliance on ETCs to provide the digital literacy training, as this is outside of their core competency.

Sincerely,

/s/

Amina Fazlullah
Policy Counsel
Benton Foundation